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Admitted in NY and NJ

May 28, 2025

By ECF

The Honorable Carol Bagley Amon
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *U.S. v. Michail Chkhikvishvili*, 24-cr-286 (CBA) – Request to appoint co-counsel

Dear Judge Amon,

I represent Michail Chkhikvishvili in the above-referenced case under the Criminal Justice Act. I am writing to respectfully request that the Court assign Zachary Taylor as co-counsel for Mr. Chkhikvishvili. I submit that the appointment of co-counsel is warranted in this case because of the seriousness of the issues presented, the complexity of the case, and the quantity of discovery. As the Court is likely aware, Mr. Taylor is a highly effective advocate and a respected member of the CJA panel in this district. I respectfully request that Mr. Taylor be compensated at the standard CJA rate in light of his experience.

Respectfully submitted,

By: /s/Samuel Gregory/
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